



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

3 1 0054

SITE: Brown's Dump
BREAK: 3.1
OTHER: _____

July 22, 2005

4WD - SRTSB

By U.S. Mail

Mr. Chris Pearson
Department of Solid Waste and Resource Management
140 West Monroe Street
Suite 200
Jacksonville, Florida 32202-3713

SUBJ: Work Plan Addendum, Phase 3 Additional Sampling Plan - Revision 3
Brown's Dump - Jacksonville
EPA I.D. Number: FLD 980 847 016

Dear Mr. Pearson:

The U.S. Environmental Protection Agency (EPA) has completed its review of the above document dated July 2005. As of the date of this letter, comments have not been received from the State.

Enclosed with this letter are a few EPA comments which need to be addressed; however, the comments are minor and editorial in nature, and the plan is conditionally approved.

The conditional approval will be final upon receipt of responses to the enclosed comments and any associated plan updates. Please provide the response/plan updates within twenty (20) calendar days from receipt of this letter.¹

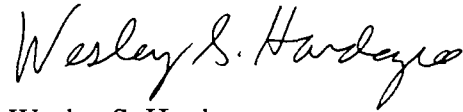
¹ Because of the minor changes needed in response to the enclosed comments, replacement pages rather than a full re-submission of the plan is acceptable.

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If you have any questions on this letter or the project in general, please feel free to call me at (404) 562-8938.

Sincerely,



Wesley S. Hardegree
Remedial Project Manager

Enclosure: 1. EPA Comments

cc: Joe Alfano, EPA - SRTSB
L'Tonya Spencer, EPA - SRTSB
Mary Nogas, FDEP - Northeast District
Tony Wagner, CH2M Hill
Nellie Tunsill, COEJ

EPA COMMENTS ON THE PHASE 3 ADDITIONAL SAMPLING PLAN - REVISION 3
BROWN'S DUMP SITE - JACKSONVILLE, FLORIDA
EPA I.D. NUMBER: FLD 980 847 016
July 2005

1. **Section 10.1.1, page 10-2:** The second bullet states that "...two composite depth interval soil sample will be analyzed..." The plan then goes on to state that one of these depth intervals will be the 0-6 inch interval and the other interval will be "each [emphasis added] of the depth intervals where ash greater than 0 percent and less than 25 percent." The implies one confirmed interval (i.e., the 0-6 inch interval) will be sampled and anywhere from 1 to 3 additional intervals, depending on ash content. Is the following a more accurate statement of the plan's intent?

"For parcels requiring dioxin analysis as a result of the above criteria, one composite depth interval soil sample will be analyzed (0-6 inch interval) and a composite sample from each of the depth intervals where ash greater than 0 percent and less than 25 percent."

2. **Section 10.1.1, page 10-1:** The correlation evaluation used the federal TEQ value. As you know, this value is much higher than the Florida TEQ. However, since the correlation using the federal TEQ was so poor, one can assume the correlation using the State TEQ would be even worse. No plan revision is needed in response to this observation.
3. **Table 12-4:** One of the columns is "analysis for TEQ." Since dioxin analysis is only triggered in certain circumstances, should this column title be "analysis for TEQ as based on ash and lead results?"